



CONNECTICUT PHARMACISTS ASSOCIATION

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Statement
Before the General Assembly's
Committee on Public Health

Monday
March 3, 2008

Re: SB 460: An Act Concerning the Administration of Vaccines by Licensed Pharmacists

Good morning Rep. Sayers and Sen. Handley. My name is Margherita Giuliano. I am a pharmacist and the Executive Vice President of the Connecticut Pharmacists Association. The Connecticut Pharmacists Association is a professional organization representing approximately 1,000 pharmacists in the state. I am here to support SB 460: An Act Concerning the Administration of Vaccines by Licensed Pharmacists

This bill seeks to amend current legislation that allows a pharmacist to administer the flu vaccine to the adult population. It would give pharmacists the ability to administer any vaccine to an adult patient pursuant to the order of a prescribing practitioner.

As of January, 2008, there has been a change in the way Medicare reimburses providers for the administration of vaccines that are covered under Medicare Part D. Unlike Medicare Part B, the administrator of the vaccine cannot **directly** bill Part D unless they are a Part D provider. Physicians are not Part D providers. The Centers for Medicare and Medicaid Services (CMS) has stated that the optimal condition is to have one bill submitted to the Part D plans that would cover the cost of the vaccine, the dispensing fee and the administration fee.

What Drugs are affected?

The flu vaccine and the pneumococcal vaccine are still covered under Part B. Vaccines like Hepatitis B and the Tetanus vaccine are only covered under Part B for certain conditions. For treatment they are covered under Part B. For prevention they are covered under Part D. Zostavax is a vaccine used in the Medicare population to treat shingles. It is only covered by Medicare Part D.

How this affects the Medicare Patients

For the beneficiary who needs to obtain a Part D vaccine there are few alternatives.

- The physician can administer the vaccine, but may bill the patient who in turn would seek reimbursement from the Part D plan.
- Medicare part D plans have provided patients with forms they can bring to their provider to have filled out for reimbursement.
- There is also a web portal available for physicians to access to facilitate reimbursement for the administration of the vaccine.

However, there are some Medicare part D plans that have stated they will only reimburse for administration by pharmacy personnel. I have attached information from Medco stating this policy.

The most efficient way of handling this issue is to expand the current law to allow pharmacists to administer all vaccines to the adult population.

- Pharmacists that have gone through the approved educational certification have been trained appropriately to handle **all** vaccines.
- Pharmacy students that graduate from UConn School of Pharmacy receive the immunization certification as part of their curriculum.
- This will increase the number of trained health care providers ready to respond and administer vaccines in the case of an emergency.

Finally, by expanding this legislation it provides not only the most efficient way of dealing with this new Medicare requirement it also increases access of vaccines to our Medicare patients.

medco

January 2008

Re: Medco and Medco Sponsors of Medicare Part D Prescription Drug Programs (PDP) and Medicare Advantage Prescription Drug Programs (MA-PD)

Dear Pharmacy:

This letter is to notify you that, as a Pharmacy participating in a Medco Health Solutions, Inc. ("Medco") Medicare Part D pharmacy network(s), effective January 1, 2008, the Centers for Medicare and Medicaid Services now includes payment of a fee for vaccine administration in the standard Medicare Part D benefit. Effective January 1, 2008, your Participating Pharmacy Agreement is hereby amended as follows.

1. Pharmacy agrees to accept payment for the provision of Covered Services to include Medicare Part D-covered injectable vaccine products and for the administration of same via injection by a certified, trained, and qualified registered pharmacist or other healthcare professional staff employed by Pharmacy as set forth herein to Eligible Persons in Medicare Part D Programs administered by Medco as follows:
 - a) **Covered Medicare Part D injectable vaccine product:** Equal to the terms and conditions defined in appropriate network schedule(s) and accepted by Pharmacy for Covered Services, and
 - b) **Administration of the Medicare Part D-covered injectable vaccine product via injection, administered to Eligible Person by a certified, trained, and qualified registered pharmacist or other healthcare professional staff employed by Pharmacy:** Administration fee of up to \$20 will be paid to Pharmacy submitting a valid claim through the TelePAID[®] System indicating that the Medicare Part D-covered vaccine product was dispensed and administered by Pharmacy. Pharmacy attests that a registered pharmacist or other healthcare professional staff under their employ is certified, trained, and qualified to, and does, administer the Medicare Part D-covered injectable vaccine product as indicated on submitted claim. Administration of covered vaccine shall be indicated by submitting consistent with the Medco Payer Sheet.
2. Pharmacy hereby agrees that by administering Medicare Part D-covered vaccine to an Eligible Person, Pharmacy will accept the foregoing administration fee as payment in full for this service.
3. Pharmacy further agrees to submit claims consistent with the Medco Version 5.1 Medicare Part D Payer Sheet Updated January 2008, which is available on the Pharmacist Resource Center (www.medco.com/rph) website for use by Pharmacy's software consultant or vendor.
4. This letter supplements and becomes part of the Participating Pharmacy Agreement in effect between Pharmacy and Medco for the Medicare Part D Prescription Drug Program.
5. Except as modified herein, all other terms and conditions of the corresponding network schedule(s) shall remain in full force and effect.

Sincerely,

Medco

Medco Account # [REDACTED]

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